

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:

Civil File No. 18-296 (MJD/KMM)

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION TO
COMPEL DISCOVERY**

Having considered Plaintiffs' Motion to Compel Discovery, all papers submitted in support of and in opposition to Plaintiffs' Motion to Compel Discovery, arguments made at a hearing on March 10, 2020 before The Honorable Kate M. Menendez, and all other pertinent documents and pleadings filed in this action.

IT IS HEREBY ORDERED that Plaintiffs' Motion to Compel Discovery is **GRANTED** as follows:

- (1) Within 14 days of this Order, Defendants shall produce documents previously produced to the Minnesota Attorney General in response to the eight requests at issue in the Attorney General's Third Motion to Compel filed in *State of Minnesota v. CenturyTel*, No. 02-CV-17-3488 (Minn. Dist. Ct., 10th Jud. Dist., Anoka Cty.).
- (2) Within 14 days of this Order, Defendants shall supplement its disclosures to Plaintiffs' Interrogatory No. 2 concerning the other state attorneys general investigations into CenturyLink.

- (3) Within 14 days of this Order, Defendants shall produce the documents identified through a search of those documents previously produced in response to the state attorneys general investigations using the parties' agreed-upon search terms (*see* Exhibit Y to the Declaration of Michael D. Blatchley).
- (4) Defendants are required to include CenturyLink's "Integrity Line" email address as a document custodian. Within 14 days of this Order, Defendants shall produce the documents identified through a search of documents in CenturyLink's Integrity Line email using the search terms addressed in Exhibit CC of the Declaration of Michael D. Blatchley.

IT IS SO ORDERED.

Dated: _____

The Honorable Kate M. Menendez
United States Magistrate Judge